

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 22-cr-20601

Honorable Paul D. Borman

vs.

Zaman Mohammed Alshafey,

Defendant.

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**First Forfeiture Bill of Particulars**

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The United States, by and through its counsel, submits this First Forfeiture Bill of Particulars, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to supplement and clarify the forfeiture allegations contained in the Indictment and to provide notice of specific property the government intends to forfeit upon conviction.

The allegations set forth in the Indictment are re-alleged and incorporated herein by this reference for the purpose of alleging forfeiture pursuant to Federal Rule of Criminal Procedure 32.2(a) and 18 U.S.C §§ 981(a)(1)(C), 982(a)(1), (a)(7) and 28 U.S.C. § 2461(c). Upon defendant's conviction of one or more of the offenses charged in Counts 1 through 20 of the Indictment, the United States shall seek the imposition of a forfeiture money judgment against the defendant, in favor

of the United States, representing proceeds traceable to each offense, and/or property involved in the offense. The forfeiture money judgment amount shall be up to and including the following: **Twenty-One Million Nine Hundred Fifty Three Thousand Nine Hundred Forty Six Dollars and Twenty One Cents (\$21,953,946.21).**

This notice does not limit the government from seeking the forfeiture of additional specific property, including substitute assets.

Respectfully submitted,

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United States Attorney

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Dated: February 8, 2023

**Certification of Service**

I hereby certify that on February 8, 2023, the foregoing document was electronically filed using the ECF system which will send notification of such filing to all ECF participants.

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